



Holland N. McTyeire, V
Direct (502) 587-3672 Fax (502) 540-2223 E-mail hnm@gdm.com

RECEIVED

JUN 05 2006

PUBLIC SERVICE
COMMISSION

Via Hand Delivery

June 6, 2006

Ms. Beth A. O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: *In The Matter Of: Interconnection Negotiations Between American Cellular Corporation And Coalfields Telephone Company, Foothills Rural Telephone Cooperative, North Central Telephone Cooperative, Peoples Telephone Cooperative, And Thacker-Grisby Telephone Company Pursuant To Section 252(b) Of The Communications Act of 1934, As Amended By The Telecommunications Act of 1996, Case No.*

Dear Ms. O'Donnell:

Case No. 2006-00715

Enclosed herewith please find for filing with the Commission an original and ten (10) copies of the Joint Motion To Amend The Effective Request Date For Negotiations Under The Act And The Settlement Agreement in the above styled matter.

Please do not hesitate to contact the undersigned should you have any questions concerning this filing.

Sincerely,

Holland N. McTyeire, V

HNM/jh

Enclosures

cc: Eileen M. Bodamer
William Francis
Leon M. Bloomfield

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE COMMONWEALTH OF KENTUCKY

RECEIVED

JUN 05 2006

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF :)
)
INTERCONNECTION NEGOTIATIONS BETWEEN)
AMERICAN CELLULAR CORPORATION AND)
COALFIELDS TELEPHONE COMPANY, FOOTHILLS)
RURAL TELEPHONE COOPERATIVE, PEOPLES)
TELEPHONE COOPERATIVE, AND)
THACKER-GRIGSBY TELEPHONE COMPANY)
PURSUANT TO SECTION 252(B) OF THE)
COMMUNICATIONS ACT OF 1934, AS AMENDED)
BY THE TELECOMMUNICATIONS ACT OF 1996)
)

Case No. 2006-00715

**JOINT MOTION TO AMEND THE EFFECTIVE REQUEST DATE FOR
NEGOTIATIONS UNDER THE ACT AND THE SETTLEMENT AGREEMENT**

Holland N. McTyeire, V

GREENEBAUM DOLL & MCDONALD PLLC
3500 National City Tower
101 South Fifth Street
Louisville, Kentucky 40202
Telephone: (502) 589-4200
Facsimile: (502) 587-3695
E-mail: hnm@gdm.com

and

Leon M. Bloomfield

WILSON & BLOOMFIELD, LLP
1901 Harrison Street, Suite 1620
Oakland, California 96412
Telephone: (510) 625-8250
Facsimile: (510) 625-8253
E-mail: lmb@wblaw.net

COUNSEL FOR AMERICAN CELLULAR
CORPORATION

American Cellular Corporation, a CMRS Provider (“ACC”), and Coalfields Telephone Company, Foothills Rural Telephone Cooperative, Peoples Telephone Cooperative and Thacker-Grigsby Telephone Cooperative (collectively referred to as the “RLECs”), by and through their respective attorneys, submit the following joint motion:

1. ACC and the RLECs are parties to the interim intercarrier compensation arrangements provided for in the settlement agreement between certain signatory CMRS providers, BellSouth Telecommunications, Inc. (“BellSouth”), and certain Rural ILECs that was approved by the Commission in Case No. 2003-00045 (“Settlement Agreement”) by Orders dated April 29, 2004 and June 10, 2004.

2. Effective January 1, 2006, and in accordance with Section 3.01 of the Settlement Agreement, and consistent with Sections 251 and 252 of the Telecommunications Act of 1996 (“Act”), ACC requested negotiation of interconnection agreements with each of the RLECs.

3. Pursuant to the Act and the Settlement Agreement, the window for initiating arbitration opened on May 16, 2006 and remains open until June 10, 2006.

4. In light of the ongoing negotiations between the parties, and in the interest of promoting a negotiated resolution of any potential disputes between the parties regarding their respective rights and obligations under the Act, ACC and the RLECs agree to amend the initial request date for negotiations from January 1, 2006 to April 1, 2006. Accordingly, the window for initiating arbitration per the Act would be August 14, 2006 through September 8, 2006.

5. The Parties respectfully request that the Commission grant this joint motion to amend the effective request date for negotiations as set forth above.

Respectfully submitted this 5th day of June, 2006.

Holland N. McTyeire, V

GREENEBAUM DOLL & MCDONALD PLLC
3500 National City Tower
101 South Fifth Street
Louisville, Kentucky 40202
Telephone: (502) 589-4200
Facsimile: (502) 587-3695
E-mail: hnm@gdm.com

and

Leon M. Bloomfield

WILSON & BLOOMFIELD, LLP
1901 Harrison Street, Suite 1620
Oakland, California 96412
Telephone: (510) 625-8250
Facsimile: (510) 625-8253
E-mail: lmb@wblaw.net

BY: 
COUNSEL FOR AMERICAN CELLULAR
CORPORATION

William Francis

FRANCIS, KENDRICK AND FRANCIS
311 North Arnold Avenue, Suite 504,
Prestonsburg, Kentucky 41653
Telephone: (606) 886-2812
Facsimile: (606) 886-8833
Email: bfrancis@kih.net

BY: _____
COUNSEL FOR COALFIELDS TELEPHONE
COMPANY, FOOTHILLS RURAL
TELEPHONE COOPERATIVE, PEOPLES
TELEPHONE COOPERATIVE AND
THACKER-GRIGSBY TELEPHONE
COOPERATIVE

5. The Parties respectfully request that the Commission grant this joint motion to amend the effective request date for negotiations as set forth above.

Respectfully submitted this _____ day of June, 2006.

Holland N. McTyeire, V

GREENEBAUM DOLL & MCDONALD PLLC
3500 National City Tower
101 South Fifth Street
Louisville, Kentucky 40202
Telephone: (502) 589-4200
Facsimile: 587-3695
E-mail: hnm@gdm.com

and

Leon M. Bloomfield

WILSON & BLOOMFIELD, LLP
1901 Harrison Street, Suite 1620
Oakland, California 96412
Telephone: (510) 625-8250
Facsimile: (510) 625-8253
E-mail: lmb@wblaw.net

BY: _____

COUNSEL FOR AMERICAN CELLULAR CORPORATION

William Francis

FRANCIS, KENDRICK AND FRANCIS
311 North Arnold Avenue, Suite 504,
Prestonsburg, Kentucky 41653
Telephone: 606-886-2812
Facsimile: 606-886-8833
Email: bfrancis@kih.net

BY: *William B. Francis*

Attorneys for Coalfields Telephone Company,
Foothills Rural Telephone Cooperative,
Peoples Telephone Cooperative and Thacker-
Grigsby Telephone Cooperative